

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Jwainus Perry,
Plaintiff,

V.

Civil Action
No. _____

Luis S. Spencer, et al.,
Defendants.

AFFIDAVIT OF JESSE SCROGGINS, IN REGARDS TO THE ARBITRARY ACTIONS
IN WHICH SOUZA BARANOWSKI CORRECTIONAL CENTER (SBCC) OFFICIALS
HOUSE INMATES THEY BELIEVE HAVE ENEMY CONCERNS.

I, Jesse Scroggins, solemnly swear and depose as followed that:

- 1). I am a citizen of the United States of America, currently in the lawful custody of the Massachusetts Department of Corrections, at Souza Baranowski Correctional Center, located in Shirely, Massachusetts.
- 2). I have been housed at SBCC, for almost a year.
- 3). I have been told by various SBCC officials that I have, 21 individuals on my "enemy list."
- 4). Out of the 21 individuals, I've actually had physical altercations with, 19.
- 5). Despite having 21 individuals on my enemy list this never impeded the SBCC officials from placing me in general population.
- 6). All 21 individuals on my enemy list are also/have been, in general population.
- 7). Despite having all of these individuals listed as my enemies, the admin-

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istration here at SBCC, still allowed me to be in general population, and on the same side of the prison as many of these same individuals at the same time.

This affidavit is the truth as I know it to be, signed under the pains and penalty of perjury on this, 24th, day of September 2011.

Dated: 9/24/11


Jesse Scroggins